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June 3, 2022

Hon. Anne Y. Shields  
United States District Court  
Eastern District of New York  
100 Federal Plaza  
Central Islip, New York 11722

Re: **Nassau County Public Administrator of the Estate of Walter Orlando Cruz  
Perez v. The County of Nassau and the Nassau County Police Department**  
**Docket No.: 1:18-CV-05327 (DRH-AYS)**

Dear Magistrate Judge Shields:

This office represents the Plaintiff in the above matter. We submit this Joint Status Letter with Ralph J. Reissman, Esq., Deputy County Attorney, representing defendants in this matter, pursuant to the Court's Text Order dated March 23, 2022.

All document discovery has been exchanged and there are no outstanding discovery demands for either party.

On April 21, 2022, Plaintiff exchanged liability expert Darrin K. Porcher, Ed.D. and expert Forensic Pathologist Dr. Jennifer L. Hammers, D.O., FCAP, FASP.

We thank the Court in advance for its continuing consideration.

Respectfully,  
*Elliot M. Schaktman*  
ELLIOT M. SCHAKTMAN

cc (Via ECF): Ralph J. Reissman, Esq.  
Deputy County Attorney  
County of Nassau